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10 **NEW U LIFE CORPORATION**

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**  
13

14 T1 PAYMENTS LLC, a Nevada limited  
15 liability company,

16 Plaintiff,

17 vs.

18 NEW U LIFE CORPORATION, a  
19 California corporation,

20 Defendant.

21 AND RELATED COUNTERCLAIM  
22

Case No. 2:19-cv-01816-ART-DJA

**MOTION TO WITHDRAW AS *PRO HAC*  
VICE COUNSEL OF RECORD;  
DECLARATION OF BRADLEY O.  
CEBECI; [PROPOSED] ORDER**

23  
24 Pursuant to Local Rule IA 11-6 and Rule 1.16 of the Nevada Rules of Professional Conduct,  
25 undersigned counsel moves the Court for an order authorizing Bradley O. Cebeci of Rome LLP to  
26 withdraw as counsel for Defendant and Counterclaimant New U Life Corporation (“New U Life”).

27 This Motion is made and based upon the following points and authorities and the pleadings  
28 and papers on file herein.

1 DATED: January 23, 2024

**BROWN BROWN & PREMSRIRUT**

2  
3 By: /s/ Puoy K. Premsrirut

4 Puoy K. Premsrirut, Esq.

5 And

6 DATED: January 23, 2024

**ROME LLP**

7 By: /s/ Brianna Dahlberg

8 Brianna Dahlberg, Esq.

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTION**

Local Rule IA 11-6(b) provides, “If any attorney seeks to withdraw after appearing in a case, the attorney must file a motion or stipulation and serve it on the affected client and opposing counsel.” Furthermore, LR 11-6(e) provides that “no withdrawal or substitution will be approved if it will result in delay of discovery, the trial, or any hearing in the case.” Similarly, Nevada Rule of Professional Conduct 1.16(b) provides that a lawyer may withdraw from representing a client if “[w]ithdrawal can be accomplished without material adverse effect on the interests of the client.”

On August 4, 2021, this Court entered an Order Adopting the January 14, 2021 Report and Recommendation of Magistrate Judge Daniel J. Albrechts (“Order”). The Order revoked Rome LLP partner, Bradley O. Cebeci’s privilege to practice pro hac vice in this case and also imposed conditions on Mr. Cebeci’s firm Rome LLP and its co-counsel Brown Brown & Premsrirut to screen Mr. Cebeci from this case going forward, which they have done. See Dkt. #84, 153 and 156. Nonetheless, Mr. Cebeci still appears on the docket as one of the attorneys of record for New U Life, notwithstanding the fact that Mr. Cebeci has been entirely screened from, and has had no involvement whatsoever in, the handling of this case since August 4, 2021. Declaration of Bradley O. Cebeci at ¶2. Accordingly, Counsel brings this Motion as a matter of housekeeping so that the docket will no longer reflect Mr. Cebeci as Counsel of Record.

Because Mr. Cebeci has been entirely screened from, and has played no role whatsoever in, the handling of this case since August 4, 2021, his withdrawal as Counsel of Record will have no impact on Rome LLP and Brown Brown & Premsrirut’s continuing representation of New U Life as Counsel of Record in this action. Accordingly, the Court’s approval of this Motion will not result in the delay of discovery, the trial, or any hearing in this case, or otherwise adversely impact the interests of New U Life.

**CONCLUSION**

Wherefore, for all the foregoing reasons, Counsel respectfully requests that this Court grant this Motion and allow Bradley O. Cebeci to withdraw as Counsel of Record for New U Life.

DATED: January 23, 2024

**BROWN BROWN & PREMSRIRUT**

By: /s/ Puoy K. Premsrirut

Puoy K. Premsrirut, Esq.

and

DATED: January 23, 2024

**ROME LLP**

By: /s/ Brianna Dahlberg

Brianna Dahlberg, Esq.

**DECLARATION OF BRADLEY O. CEBECI**

I, Bradley O. Cebeci, declare and state as follows:

1. I am an attorney licensed to practice in the state and federal courts of California, and am a Partner with Rome LLP. I make this declaration on personal knowledge and, if sworn as a witness, could competently testify to each of the facts set forth herein.

2. Rome LLP is counsel for Defendant and Counterclaimant New U Life Corporation (“New U Life”) in the above-captioned case. I have been entirely screened from, and have had no involvement whatsoever in, the handling of this case since August 4, 2021, when the Court entered its Order Adopting the January 14, 2021 Report and Recommendation of Magistrate Judge Daniel J. Albrechts, which revoked my privilege to practice pro hac vice in this case, and imposed conditions on Rome LLP and its co-counsel Brown Brown & Premsrut to screen me from this case.

This declaration was executed on January 19, 2024 at Sevilla, Spain. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

By: /s/ Bradley O. Cebeci

Bradley O. Cebeci, Esq.

**IT IS SO ORDERED. The Clerk of Court is kindly directed to remove Bradley O. Cebeci from the Court's CM/ECF service list in this case.**

DATED: 1/24/2024



DANIEL J. ALBRECHTS  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I certify that I am an employee of Brown Brown & Premsrirut, and that on the 23rd day of January, 2024, a true and correct copy of the foregoing document entitled MOTION TO WITHDRAW AS COUNSEL PRO HAC VICE was electronically filed with the Clerk of the Court by using CM/ECF service which will provide copies to all counsel of record registered to receive CM/ECF notification.

By: /s/ Puoy K. Premsrirut

Puoy K. Premsrirut